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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TRAYVALE HARRISON,

Defendant.

Case No. 2:18-cr-144-JAD-GWF

**STIPULATION TO CONTINUE
SENTENCING HEARING**
(Fourth Request)

COMES NOW the United States of America, through Nicholas A. Trutanich, United States Attorney, and Brett Ruff, Assistant United States Attorney, counsel for the United States of America, and Jennifer Waldo, counsel for Defendant Trayvale Harrison, and stipulate and request that the sentencing hearing currently scheduled for August 10, 2020, be vacated and continued to a date and time convenient to this Court, but no sooner than sixty (60) days after August 10, 2020.

The stipulation and request are made for the following reasons:

1. On March 16, 2020, the Chief Judge of the U.S. District Court for the District of Nevada issued Temporary General order 2020-03 (the "General Order"). The Order explains that, due to the outbreak of the coronavirus 2019 ("COVID-2019") in the District of Nevada, the declaration by the Governor of the State of Nevada of a public health emergency due to the

1 spread of COVID-19 in Nevada, the declaration of local emergencies by local governments due
2 to COVID-19, and the public health recommendations—including recommendations for social
3 distancing and limiting large-group gatherings—the Court has sustained a “reduced ability to
4 obtain an adequate spectrum of jurors” and reduced availability of counsel and Court staff. The
5 General Order accordingly continued all civil and criminal trials until April 10, 2020, pending
6 further order of the Court, and found that “the ends of justice are best served by ordering
7 continuances, which outweighs the best interests of the public and any defendant’s right to a
8 speedy trial under 18 U.S.C. § 3161(h)(7)(A).”

9 2. Continuing this sentencing hearing will serve the critical interests emphasized in
10 the General Order and subsequent orders related to COVID-19 entered by Chief Judge Du.
11 Given the ongoing COVID-19 pandemic, the grave public-health concerns discussed in the
12 General Order, and difficulty—or impossibility—of preparing and procuring witnesses to speak
13 on behalf of the Harrison or the government, there is good cause to continue Harrison’s
14 sentencing hearing.

15 3. Indeed, additional time is needed to formulate and file any sentencing
16 memoranda and procure any possible witnesses that would be at sentencing to either speak on
17 behalf of Harrison, or on the behalf of the government, including any victims.

18 4. A continuance also will allow counsel for Harrison to adequately prepare for
19 sentencing with her client.

20 5. Counsel for Harrison and the government agree with this continuance.

21 6. Harrison is in custody and agrees with this continuance.


22 7. Thus, all parties agree to this continuance.
23
24

DATED this 16th day of July, 2020.

/s/ Jennifer Waldo

By /s/ Brett Ruff

BRETT RUFF
Assistant United States Attorney


HON. JENNIFER A. DORSEY
UNITED STATES DISTRICT JUDGE

DATED: 7/20/2020